

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)

In re:
JIN SUK KIM
Debtor

Case No. 10-18008-PM
Chapter 11

FEDERAL NATIONAL MORTGAGE
ASSOCIATION

Movant,
v.
JIN SUK KIM
Respondent.

OBJECTION TO MOTION FOR RELIEF FROM STAY

Jin Suk Kim, by its undersigned counsel, objects to the motion for relief from automatic stay for the following reasons:

1. This Court has jurisdiction to consider and determine this motion pursuant to 28 U.S.C. §1334. This is a core proceeding pursuant to 28 U.S.C. 157(b).
Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.
2. On July 2, 2010, the movant filed a motion for relief from automatic stay for the property known as 3401 Oakfield Avenue, Baltimore, Maryland,
3. The property does not produce income currently.
4. The debtor is in process of obtaining finances to fund the renovation of the property.

5. Debtor is working with investment groups and lenders to obtain money to partially pay the mortgage on all properties and also to repair/renovate empty units.
6. Debtor requires at least 60 days to obtain investments into the properties.
7. Upon renovation of the empty unit, debtor is confident that her properties would be leased to full capacity through Section 8 program.
8. Relief from stay at this time would cause the debtor to convert to Chapter 7 thereby eliminating any possibility to pay the creditors.
9. After 60 days, the debtor would agree to remove the property from stay.

Wherefore, the debtor by counsel, requests the honorable Court to deny the motion for relief from stay by the movant.

By: /s/ John Shin
Of Counsel

John Shin, Esquire
Shin Law Group
7702 Leesburg Pike, T400
Falls Church, VA 22043
571-405-6540
571-405-6543 fax
Counsel for Debtor

Certificate of Service

I hereby certify that on this 19th of July 2010, a copy of the foregoing Objection of the Debtor was served electronically through the CM/ECF system on all parties on the Mail Notice List for this case and by first class mail postage prepaid.

/s/ John Shin

Jordan B. Segal, Esq.
MORRIS/HARDWICK/SCHNEIDER
9409 Philadelphia Rd.
Baltimore, Maryland 21237
410-284-9600

W. Clarkson McDow, Jr.
Office of the U.S. Trustee
6305 Ivy Lane, Ste 600
Greenbelt, MD 20770
301-344-8110
301-344-8431